

Title: Juan D. Crisolago vs. People of the Philippines, et al.

Facts:

- March 12, 1946:** Juan D. Crisolago, a captain in the USAFFE and later a lieutenant colonel in the Armed Forces of the Philippines, was accused of treason under Article 114 of the Revised Penal Code. The complaint was filed in the People's Court.
- January 13, 1947:** Before Crisolago could be brought under the jurisdiction of the People's Court, he was indicted before a military court by the Army Chief of Staff for violations of Commonwealth Act No. 408 (Articles of War). The charges included:
 - Treason (giving information and aid to the enemy),
 - Treason (urging USAFFE members to surrender and cooperate with the enemy),
 - Executing certain civilians during the war.
- The military court acquitted Crisolago of the first and third charges but found him guilty of the second charge (execution of civilians) and sentenced him to life imprisonment on **May 8, 1947**.
- June 17, 1948:** Republic Act No. 311 abolished the People's Court, and the pending criminal case against Crisolago was transferred to the Court of First Instance of Zamboanga. The charges of treason were amplified in an amended information.
- Arraigned in the Court of First Instance of Zamboanga, Crisolago filed a motion to quash, challenging the court's jurisdiction and pleading double jeopardy.
- The court denied his motion and, after Crisolago pleaded not guilty, proceeded to trial.
- Crisolago filed a petition for certiorari and prohibition in the Supreme Court to halt the trial and seek dismissal of the case.

Issues:

- Does the decision of the military court constitute a bar to further prosecution for the same offense in a civil court due to double jeopardy?
- Did the military court have jurisdiction over the offense, given that the People's Court had previously filed charges?

Court's Decision:

- Double Jeopardy:**
 - Relying on previous rulings (U.S. vs. Tubig and Grafton vs. U. S.), the Court determined that Crisolago's prosecution in the civil court constituted double jeopardy. As the military court and the civil court derive their power from the same sovereignty (the Philippines), a conviction or acquittal in one bars prosecution in the other for the same offense.
 - The Court ruled that the additional overt acts specified in the amended information in

Zamboanga did not constitute new and distinct offenses but were part of a continuous offense of treason.

2. **Jurisdiction**:

- Concurrent Jurisdiction: The military court first obtained jurisdiction over Crisologo by dealing with his person when the People's Court had not yet issued a warrant or gained custody of him.
- Since the military court appropriately exercised its jurisdiction under the Articles of War and rendered a final judgment, this prevented the civil court from prosecuting the same offense.

Therefore, the Supreme Court granted Crisologo's petition for certiorari and prohibition, ordering the dismissal of the criminal treason case pending in the Court of First Instance of Zamboanga.

Doctrine:

1. **Double Jeopardy and Concurrent Jurisdiction**:

- A defendant cannot be tried for the same offense in a civil court after being tried in a military court if the offense and the sovereignty jurisdiction are identical.
- When both courts derive their power from the same sovereignty and one court has first acquired jurisdiction by obtaining custody over the person, it retains exclusive jurisdiction over the case.

Class Notes:

1. **Double Jeopardy**:

- Found in Section 21, Article III of the 1987 Philippine Constitution.
- Prevents a person from being prosecuted again for an offense they have been acquitted or convicted of by a competent court.
- Applied here based on jurisprudence prior to 1987 (U.S. vs. Tubig, Grafton vs. U.S.).

2. **Concurrent Jurisdiction**:

- Refers to scenarios where more than one court has the authority to adjudicate the same offense.
- The first court to acquire jurisdiction generally maintains it, provided it has control over the person of the accused.

3. **Commonwealth Act No. 408 (Articles of War)**:

- Military laws applicable to Filipino soldiers during and after the war.

- Ensures the military can prosecute specific wartime offenses.

****Historical Background**:**

The case reflects the transitional justice issues in the Philippines post-World War II. During this period, numerous Filipinos, including military officers like Crisologo, faced charges of collaboration with Japanese forces. The jurisdiction tussle between emerging civil authorities and the established military courts reflected the broader reorganization of the Philippines' legal and administrative systems in the aftermath of the war.